

Non-Confidential response of Gamma

[Promoting competition and investment in fibre networks: Telecoms Access Review 2026-31](#)

About Gamma and this Consultation Response

Gamma Telecom Holdings Limited ("**Gamma**") is a Public Electronic Communications Network ("**PECN**") that provides wholesale fixed and mobile telephony and data services, to some 1,500 channel partners. In all cases, our partners and subsidiaries sell almost exclusively to all sizes of businesses and not-for-profit entities throughout the UK and increasingly to various European Union member states.

This consultation response relates to Gamma and its subsidiaries. Any conflict between the implied position of Gamma in any UK Competitive Telecommunications Association (UKCTA), Comms Council UK (CCUK) or Federation of Communication Services (FCS) responses or that of any other association in which Gamma is involved, or implies Gamma is involved, is accidental and we consider that our views in this response should prevail.

Gamma trusts that this response addresses the questions posed by the Office of Communications ("**Ofcom**") and would welcome the opportunity to elaborate on any points in more detail if required.

General Comments

Gamma appreciates the opportunity to consult on The Telecoms Access Review 2026-31 and broadly welcome the regulatory continuity proposed by Ofcom.

We believe that BT continues to hold Significant Market Power (SMP) and therefore do not support the removal of any elements of the existing regulatory framework in Area 2. While we recognise the importance of evolving the market, we believe that more ambitious targets are needed to support the transition from legacy products to Fibre to the Premises (FTTP) for end customers

We have concerns with the removal of existing safeguards, as Gamma does not believe that market competition alone will be sufficient to address all challenges. There is a risk that the softening of such safeguards could in fact have the opposite effect. Under today's current remedies, providers and their customers still face long lead times and difficult journeys in complex delivery scenarios. We believe that removing measures in Area 2 risks widening the gap between the standards the industry aspires to, and the reality experienced in certain regions.

Whilst we agree with Ofcom's decision to maintain separate market definitions for Wholesale Local Access (WLA) and Leased Line Access (LLA) it is important to recognise that business customers do not rely solely on leased lines. A significant proportion of businesses—including sole traders working from home, SMEs, and public sector organisations—depend on FTTP for both business-critical voice and data services.

Openreach's build strategy continues to be heavily weighted towards residential premises. In areas where there is no alternative provider, business customers are disadvantaged: they now face higher charges for the provision of what is essentially the same residential product purely because they are deemed to be consuming the service at a business premise. Despite Gamma campaigning since the announcement of PSTN closure for recognition of business requirements, business needs appear to be an afterthought. The WLR replacement products such as Single Order Generic Ethernet Access (SOGEA) and FTTP were primarily designed with residential journeys in mind with business use cases shoehorned in at a later date. This entailed significant changes after providers had already absorbed considerable costs and operational challenges.

Gamma has long advocated for the need for a dedicated business lead within Ofcom. This need is arguably more relevant now, given that Openreach has begun commercially distinguishing between business and residential customers based simply on address. We have long argued for a separation in reporting for business provisions as we firmly believe that business customers are not experiencing the reported success rate for the overall PSTN migration program. If Openreach is now capable of identifying business customers, a feat they have long claimed unable to do, then it follows that development of distinct reporting for business provision will enable industry and Ofcom to measure the QoS being experienced for business customers.

Quality of Service (QoS)

In Gamma's opinion, the current QoS measures lack the necessary ambition for a market that is now reaching maturity. Openreach's service levels, particularly regarding installation times at complex sites, remain inadequate and contribute to a suboptimal customer experience.

Accordingly, we recommend that Openreach improve both the transparency, and the quality of information provided at the point of order and throughout the service delivery process. When a premise is marked as Ready for Service (RFS), Openreach should, as a matter of standard practice, provide an estimated installation date as early as possible following receipt of the order. In a number of cases, we find that the RFS mark is misleading to both providers and their customers, with the marked premise clearly not ready for service.

Currently, in complex order journeys, where the Customer Committed Date (CCD) is not applied and the order enters the uncommitted workstack, customers are left without any meaningful updates—sometimes for weeks or even months. This lack of visibility often leads to customer frustration and, ultimately, order cancellations. It is confusing to an end customer, having been informed that their premise is 'Ready for Service' to learn that it is not in fact Ready for Service and delivery is often delayed substantially.

This dynamic results in the Communications Provider (CP) absorbing the cost of the failed order and losing the customer, while Openreach retains the end-user on its infrastructure regardless of the CP. The lack of timely updates from Openreach not only damages the CP's brand but also undermines trust in the broader ecosystem.

Business customers are now subject to a distinct charging model introduced by Openreach, known as Business standard. The introduction of this charge now means that businesses are financially penalised for just being defined as a business. Where there is a lack of choice of access provider, a small business now has no choice but to pay a connectivity tax to consume a product that they may not even require but has to consume under the PSTN migration.

We do acknowledge that some business installations can be inherently more complex and often have unique requirements, however these should be treated as distinct cases and the charges apportioned as required.

Gamma has actively collaborated with industry stakeholders to advocate for installation processes to be delivered in a manner that aligns with the specific expectations and operational needs of business customers. This may include site-specific considerations, such as those relevant to schools, hospitals or other specialised premises. We expect that such complex provisions will attract additional cost to provision and that this additional cost and clearly defined process will result in a better customer experience. We firmly believe that the current delivery model does not adequately meet this expectation. As a result, business customers are often paying a premium while still suffering from a poorer customer journey.

Business CPs are left to absorb the costs of these poor experiences or pass them on, along with the additional business charge, to their end customers. Business CPs are often challenged on the pace of the migration away from PSTN services. The experiences highlighted above go some way to explain the reticence of some business CPs, particularly the smaller providers, to provide the new services and of their customers to consume such services. Couple this with reduced margins on the replacement products, and in some cases reduced revenue due to consolidation of access circuits, there is a perceived lack of incentive to migrate customers away from legacy products.

This is a clear example of shrinkflation in the telecoms sector. Business CPs are now paying at least £30 more per order—significantly more for advanced installations—while simultaneously facing reduced service value.

Business customers typically require a more comprehensive service wrap, yet the current model fails to support this. As a result, CPs are forced to invest in additional support staff to compensate for the lack of adequate support further up the supply chain. This places an increasing financial burden on CPs, who are already grappling with rising costs and diminishing margins.

Gamma is concerned that should Ofcom impose minimum QoS standards in Area 3, while declining to do so in Area 2, the absence of a clear distinction between residential and business QoS may have the unintended consequence that Openreach may prioritise simpler residential installations at the expense of more complex business deployments. To mitigate this, we recommend that QoS metrics be disaggregated for residential and business customers to ensure that both segments receive service levels appropriate to their respective requirement.

To address the shortcomings and ensure a level playing field, we suggest that Ofcom introduce minimum QoS standards in Area 2—either aligned with Openreach’s current performance levels or consistent with those proposed for Area 3. The introduction of new Minimum Service Levels (MSLs) would support Ofcom’s objectives by protecting consumers, fostering retail competition, and promoting investment and infrastructure-based competition. These standards would safeguard service quality without materially affecting Openreach’s incentives to invest in FTTP. Minimum QoS standards should serve as a regulatory backstop rather than a performance ceiling. Their purpose is to prevent service degradation and to support the industry in negotiating higher service commitments. By definition, these standards represent the lowest acceptable level of performance; contractual agreements between Openreach and its customers should exceed these baselines to ensure robust service delivery and consumer protection. Implementing such a framework would enhance market fairness and consumer outcomes, while having minimal impact on investment incentives, given that Openreach and its competitors already surpass these thresholds in many areas.

Exchange Exit

Whilst we understand the requirement of BT Group to exit the proposed exchanges, we do not think that industry should, as has happened with the PSTN withdrawal, carry the financial burden. In particular, the smaller and regional providers could face significant financial and logistical hurdles in relocating infrastructure and adapting access strategies. BT Group, as the infrastructure owner, should bear the primary cost of decommissioning.

Openreach, as part of BT must facilitate the relocation of wholesale services to new sites. Although downstream providers will cover their own costs, Openreach should, at the very least, provide the tools and planning support to ease the transition.

Even with advance notice, migrating critical services may lead to service disruptions if end customers are not properly informed or if replacement infrastructure is delayed. Openreach must ensure that end customers do not experience loss of connectivity or degraded service quality due to poor coordination or insufficient planning during the infrastructure migration programme. Where there are any service disruptions, Openreach should ensure that it is planned, and that everyone in the chain is aware, and that there is an escalation route where things do not work as expected. Openreach should also have a process for critical services, such as CNI, emergency sites and vulnerable customers.

Where legacy replacement services are unavailable Openreach should work proactively and transparently with CPs and infrastructure partners to ensure that viable alternatives are in place before any legacy services are withdrawn.